

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SYMOLOGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:15-cv-01183-JRG-RSP
	§	
vs.	§	PATENT CASE
	§	
LVMH WATCH & JEWELRY USA, INC.	§	
	§	
Defendant.	§	
	§	

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**UNOPPOSED MOTION TO SUBSTITUTE DEFENDANT**

SYMOLOGY INNOVATIONS, LLC (“Plaintiff” or “Symbology”) files this Unopposed Motion to Substitute Defendant. On September 3, 2015, Plaintiff filed its Original Complaint against Defendant, TAG HEUER USA. Counsel for LVMH Watch & Jewelry USA, Inc. informed Plaintiff’s counsel that TAG Heuer USA is a non-existent entity and that LVMH Watch & Jewelry USA, Inc. is understood to be the intended Defendant. The parties have agreed, therefore, to substitute LVMH Watch & Jewelry USA, Inc. for TAG Heuer USA in this case.

Plaintiff therefore moves the Court to substitute Defendant, LVMH Watch & Jewelry USA, Inc. for TAG Heuer USA.

Dated: September 3, 2015

Respectfully submitted,

/s/ Jay Johnson  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Court Rule CV-7(i), I certify that on September 3, 2015, Jay Johnson, counsel for Plaintiff Symbology Innovations, LLC, conferred with Mr. Ricardo Bonilla, counsel for Defendant LVMH Watch & Jewelry USA regarding this Motion. Mr. Bonilla confirmed that Defendant agrees with the Motion.

/s/ Jay Johnson  
Jay Johnson

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 3, 2015.

/s/ Jay Johnson  
Jay Johnson